IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

JULIE HODGE,)	
)	1:24-cv-02226
Plaintiff,)	
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and)	Judge Jorge L. Alonso
NORTH ACTUAL DIOLOG DECLOSALA)	
NORTHEAST ILLINOIS REGIONAL)	
COMMUTER RAILROAD)	
CORPORATION, d/b/a METRA)	
)	
Defendant.		

PLAINTIFF'S UNOPPOSED MOTION FOR A CONFIDENTIALITY ORDER

NOW COMES the Plaintiff, JULIE HODGE (hereinafter "Plaintiff"), by and through her counsel, SPEARMAN LAW, LLC and, pursuant to Fed. R. Civ. P. 26 and this Court's local rules, request that this Honorable Court enter a Confidentiality Order and a HIPAA Qualified Protective Order in this case. In support of this motion, the Plaintiff state the following:

- 1. Plaintiff filed her initial complaint on March 19, 2024. (*See* Dkt. # 1) The operative complaint is her first amended complaint, filed on May 6, 2024. (*See* Dkt. # 8) This is a Title VII claim arising out of Plaintiff's employment with the Defendant. Plaintiff alleges that the Defendants engaged in discrimination based on religion race, and gender. The Plaintiff also alleges a retaliatory discharge claim.
- 2. As discovery moves forward, Plaintiffs' allegations will require discovery of personal and confidential information. This information may include, but is not limited to, personal identifying information, employment information, health information, and disciplinary

records. For instance, the Defendant has requested financial and health information from

Plaintiffs. These files contain significant amounts of confidential and personally

identifying health information. Information of this nature is routinely protected by a

Confidentiality Order.

3. Counsel for the Plaintiff has communicated with Defendant's counsel regarding

this motion and provided copies of the proposed orders. The proposed orders are substantially

similar to the models for the United States District Court for the Northern District of Illinois.

4. Defendant's counsel does not oppose this motion.

5. Pursuant to this Court's Standing Order Plaintiff has sent a copy of the proposed

order, and a redline showing changes to the same against the NDIL's Model, to the address given

on the Court's website.

WHEREFORE, the Plaintiff respectfully request that this Honorable Court grant their

unopposed motion and enter the proposed Confidentiality Order.

/ Respectfully Submitted,

/s/Kendra D. Spearman

Kendra D. Spearman 150 S. Wacker Drive, 24th Floor Chicago, IL 606006

212.799.2602

312-788-2602

kendra@spearmanlaw.com

2

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NORTHEAST ILLINOIS REGIONAL)
COMMUTER RAILROAD)
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)
Defendant.	

CERTIFICATE OF SERVICE

I hereby certify that on **January 9, 2025** I electronically filed the foregoing *Plaintiffs Unopposed Motion for a Confidentiality Order*, with the Clerk of the Central District of Illinois which will send notification of such filing to the following CM/ECF participants:

TO: David V. Cascio
Laner Muchin, Ltd.
515 North State Street, Suite 2400
Chicago, Illinois 60654
(312) 467-9800
(312) 467-9479 (fax)
Dcascio@lanermuchin.com
Attorney for Defendant

Respectfully Submitted,

/s/Kendra D. Spearman Kendra D. Spearman 150 S. Wacker Drive, 24th Floor Chicago, IL 606006 312-788-2602 kendra@spearmanlaw.com